



## Privacy & Cookie Policy



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## 1 Background

Quid NZ Limited, a company registered in New Zealand with company number 6191487 (hereafter referred to as “**Quid**”) is registered with the Financial Market Authority as a financial service provider registration number (FSP732651) to provide the following services

- Keeping, investing, administering, or managing money, securities, or invest portfolios on behalf of other clients
- Operating a money or value transfer service
- Issuing and managing means of payments
- Changing foreign currency

Quid must comply with the New Zealand Privacy Act 1993 (“Privacy Act”) and the Privacy Act 2020 which will come into force in December 2020, quid recognises the importance of safeguarding your personal and financial information.

As an institution offering financial services, we need to collect, hold and use personal information about you in the course of providing our products and services. This Privacy Policy sets out how we will collect, use and protect your personal information but it does not limit or exclude any of your rights under the Privacy Act. If you wish to seek further information on the Privacy Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

We may change this policy by uploading a revised policy onto the quid website or app. Any change will apply from the date that we upload the revised policy.

quid recognises the importance of the protection of personal information. This Privacy Policy (“Policy”) sets out our practices in relation to information that is gathered from persons who visit our website <https://nzpoc.quidglobal.com/log-in> (“Site”), use of our mobile applications (“Apps”) (both as amended from time-to-time), or otherwise where information that is shared with us and is defined as Personal Information (collectively: “Users”).

## 2 What information do we Collect?

We collect two types of data and information from Users.

The first type of information is un-identified and non-identifiable information pertaining to a User(s), which may be made available or gathered via your use of the Site (“**Non-Identifiable Information**”).

We are not aware of the identity of a User from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference,



access time, etc.) in order to enhance the functionality of our Site. We may also collect information on your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

The type of **Personal Information** we collect includes:

- **Device Information:** We collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- **Contact information:** If you choose to contact us you will be asked to provide us certain details such as: full name; e-mail or physical address, and other relevant information which the User may provide but will constitute Personal Information.
- **Information provided by you at the time of registering for our service** such as: name; telephone number; email address; residential address; date of birth; nationality; bank account information, other identification details (e.g. passport) and transactional information. This information may also be input by you when reporting a problem with our Website, App or other service;
- Any correspondence sent to Us by you; and/or

Navigation data. The computer systems of the Website collect some Personal Information that is required in the use of Internet communication protocols. This information is not collected to be associated with you, but by its very nature could, through processing and association with data held by third parties, allow you to identify yourself. This data is used to obtain anonymous statistical information on the use of the Website and to check its correct functioning

### 3 How do We receive personal information from you?

We receive your Personal Information from various sources:

- When you voluntarily provide us your Personal Information in order to register on our Site or App, or to make contact with Us in some way.;
- When you use or access Our Site or App in connection with your use of our services;
- From third party providers, services and public registers (for example, traffic analytics vendors).

### 4 How do We use the personal information we collect?

Any purpose for which we collect and use your personal information is authorised by the Privacy Act. We will use your personal information:



- Communicating with you – sending you notices regarding our services, providing you with technical information and responding to any customer service issue you may
- Conducting statistical and analytical purposes, intended to improve the Site.
- The execution of a contract of which you are a party or to the execution of pre-contractual measures taken on your request (e.g.: the provision of your services)
- To allow the correct delivery of the various features you requested e.g. to carry out your transaction instructions or issue you with a current account
- To fulfil any obligations required by applicable laws, regulations or Community legislation, or satisfy requests from authorities
- To notify you of any change to our service
- To develop new products
- To conduct analysis to track business performance and aid in the operation and protection of the business
- To ascertain, exercise or defend a right in court or whenever the jurisdictional authorities exercise their jurisdictional duties;
- To allow navigation of the Website and the provision of our services
- To find specific requests addressed to us

## 5 How we share your personal information?

In addition to the different uses listed above, we may transfer or disclose Personal Information to our parent company and subsidiaries, as well as affiliated companies and subcontractors in relation to services that we provide to you.

We may share Personal Information with our trusted third-party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- Providing the services, we provide;
- Hosting and operating our Site or App
- Performing research, technical diagnostics or analytics

We do not rent, sell, or share Users' information with third parties except as described in this Privacy Policy.

We may also disclose information if we have good faith to believe that disclosure of such information is helpful or reasonably necessary to:

- comply with any applicable law, regulation, legal process or governmental request;
- enforce our policies (including our Agreement), including investigations of potential violations thereof;
- investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- to establish or exercise our rights to defend against legal claims;
- prevent harm to the rights, property or safety of us, our users, yourself or any third party; or for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights



## 6 Marketing

We may use your Personal Information, such as your name, email address, telephone number, etc. ourselves or by using our third-party subcontractors for the purpose of providing you with promotional materials, concerning our services, which we believe may interest you. These communications will include:

- To carry out direct marketing via e-mail for services similar to those signed by you, subject to your refusal to receive such communications, which may be expressed during registration or on subsequent occasions by contacting [privacy@quidglobal.com](mailto:privacy@quidglobal.com)
- To carry out marketing activities such as: preparing studies, research, market statistics; send informational and promotional material relating to the activities, services and products quid and our commercial partners (without any communication of Personal Information held by us to the aforementioned Partners)
- Send you surveys to improve the service (“customer satisfaction”). Such communications may be made by e-mail, in-app, or text message, by mail and / or the use of the telephone with operator and / or through the official pages of quid on social networks
- For statistical purposes, without being able to trace your identity.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important e-mail communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

## 7 Accessing and correcting your personal information

Subject to certain grounds for refusal set out in the Privacy Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email us at [privity@quidglobal.com](mailto:privity@quidglobal.com) Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).



## 8 Data Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client Personal Information, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion or as requested by you.

## 9 Where is Your personal information is stored?

Personal Information that is collected from you may be transferred to and stored at a location outside of the European Economic Area (EEA). Staff working for on behalf of quid located outside the EEA may also process your Personal Information. This may be to process your payment or to provide various support services.

Prior to your Personal Information being transmitted outside the EEA, we will ensure that either the destination country is the subject of an EU Adequacy Decision or there are measures in place that are equal to EEA standards to ensure the security of your data.

Whilst we undertake to do our best to ensure your Personal Information is protected, and procedures and features are in place to prevent unauthorised access, any transmission of data to our Website is at your own risk. This is because we are not able to guarantee the security of your data transmitted to our Website as the transmission of data via the Internet is not completely secure

## 10 Corporate Transaction

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

## 11 Minors

We understand the importance of protecting children's privacy, especially in an online environment. The Site is not designed for or directed at children. Under no circumstances shall we allow use of our services by minors without prior consent or authorization by a parent or legal guardian. We do not knowingly collect Personal Information from minors. If a parent or guardian becomes aware that his



or her child has provided us with Personal Information without their consent, he or she should contact us at: [privacy@quidglobal.com](mailto:privacy@quidglobal.com)

## 12 Complaints

If you have any questions about our Privacy Policy, receive communications purporting to be connected with us that you believe have been sent to you other than in accordance with this Privacy Policy, or would like to complain about a breach of your privacy, please contact us at [privacy@quidglobal.com](mailto:privacy@quidglobal.com). Our staff are prepared to address any concerns you may have about our handling of personal information. We will take steps to assess and handle your query and complaint within a reasonable period after we receive your request. If you are not satisfied with the outcome of this procedure or we have not responded to you within a reasonable period then you may contact the New Zealand Privacy Commissioner: [www.privacy.org.nz](http://www.privacy.org.nz).

## 13 Changes to this Privacy Policy

quid reserves the right to modify or simply update its content, in part or completely, due to changes in the applicable legislation. We will inform you of these changes as soon as they are introduced, and they will be binding as soon as they are published on the Website. quid invites you to visit this section regularly to get to know the most recent Policy

## 14 Cookie Policy

When you access or use our content, products and services, information about your general internet usage may be obtained by way of a cookie file. This is stored either on your browser or the hard drive of your computer (both Mobile or Web). Cookies perform various different functions, and the purpose of this policy is to give you a clearer understanding these.

### What Are Cookies?

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Cookies are small files which are stored on your computer or a website (both Mobile or Web). They are designed to hold a small amount of data specific to a particular client and website and can be accessed either by the website or your computer. Your browser makes cookies available each time you visit our websites or App.

### Why Do We Use Cookies?

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Cookies are used to improve your online experience and to ensure that relevant content and functions are delivered and used more effectively.

We use both session cookies and persistent cookies to perform various functions across our sites.



Session cookies are downloaded to your device temporarily for the period that you browse a particular website; these cookies might allow you to navigate between pages more efficiently or enable websites to remember the preferences you select. Persistent cookies can be used to help websites remember you as a returning visitor or ensure the online adverts you receive are more relevant to you.

### **How Do We Use Cookies?**

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When you visit our website or App, Cookies will be placed on your device in two ways. Cookies placed by quid, as the site operator, are called "first party" Cookies. Cookies may also be placed on your device by a party, and these are known as "third party" cookies. Examples of the uses of third-party cookies include collecting information about browser habits and providing tailored content to you. Customer experience and usage metrics will also be extracted from all our products.

While there are many different uses for first and third-party cookies, the cookies used by us all fall into one of the following four main categories of cookies:

- Strictly Necessary Cookies
- Functionality Cookies
- Performance Cookies
- Third Party Marketing / Targeting Cookies

Set out below is more information on these categories of cookies, including their purpose and whether these cookies collect Personal Information:

#### **Strictly Necessary Cookies**

These cookies are strictly necessary to enable you to navigate our website and App, and provide you with a more personalised service. They are used to provide content to you, as a user, and to provide products and services that you have requested.

Such cookies are essential to help your device download or stream information so that you can navigate around our websites and use its features.

Some examples of strictly necessary cookies are:

- To position information on your device or screen so that you can see and use our websites and App
- Remember the language.

These cookies do not remember your preferences or username beyond your current visit.

Some of these cookies do collect your Personal Information in order to function. They may collect the following types of Personal Information:

- IP address
- Location data



- Identify you as being logged in our websites

These cookies are deleted when you close your web browser (browser session). Click [here](#) to see how you can control the use of cookies.

### **Functionality Cookies**

These cookies are used to recognise you when you return to our website or App and allow us to remember the choices you make and to enable us to provide improved features. They also enhance the functionality of our website by storing your preferences. Functional cookies record information about choices you've made (such as language preference) and allow us to provide more personal features.

Here are some examples of the uses of performance cookies:

- To remember your preferences and settings such as language, location and marketing preferences, since your last visit;

Some of these cookies do collect your Personal Information, to enable us to provide the services as outlined above.

Functional cookies expire after a maximum 2 years. Functionality cookies can be deleted from your browser history at any point before their expiry time. Click [here](#) to see how you can control the use of cookies.

### **Performance Cookies**

These cookies are used to collect information on website usage. Such cookies are used to provide aggregated statistics on visitors to our websites and App. These statistics are used for internal purposes to help us to analyse and improve the performance of our websites, providing a better user experience.

Here are some examples of the uses of performance cookies:

- To provide statistics on how our website is used;
- To assess errors within the user experience.

While these cookies do not identify you personally while you are not logged in, they will collect your browser information and anonymised data, for the purposes outlined above.



In certain cases, some of these cookies are managed by third parties such as Google Analytics. These third parties are not capable of using these cookies for any purpose other than those outlined above, and they are unable to identify with these cookies.

Performance cookies are valid for varying periods. Some performance cookies are deleted once you close your browser, while others have an indefinite validity period. Such cookies can be deleted at any stage using your browser settings.

### **Third Party Marketing/Targeting Cookies**

These cookies are used to deliver advertisements relevant to you, based upon your activity on our website or App.

They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign.

These cookies record your visit to our website or App, the pages you have visited and the actions you have taken. We will use this information to make our website and the advertising displayed more relevant to you. We may also share this information with third parties for this purpose and to measure the effectiveness of an advertising campaign.

Targeting cookies are also used to:

- Collect information about browser habits to target website content and to target advertising;
- Link to social media networks who may use this information about your visit to target advertising to you;
- To provide advertisers with information on your visit so that they can present you with adverts that you may be interested in;
- Deliver content and marketing communications tailored to your interests based on information from your visit;
- To perform site retargeting. A retargeting pixel (a tiny unit of code) on our webpage leaves a cookie in the user's browser, which causes our adverts to be displayed or to not be displayed to you when you visit certain websites within the retargeting network (e.g. Google Display Network); and
- To perform search retargeting, which allows our adverts to be displayed on third party webpages, based upon your previous web search activities.

Third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies on our websites. These cookies are likely to be analytical/performance cookies or targeting cookies. Please note that no Personal Information is collected, an advertiser is unable to associate the cookie with a particular individual's name, address or other personal information.

These cookies are placed by third party advertising networks with our permission.



Third party cookies are valid for varying periods. Some cookies expire up to 13 months after they are last updated. Click [here](#) to see how you can control the use of cookies.

### **How can you control the use of Cookies?**

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You can amend your browser settings to block some or all cookies. To do this, follow the instructions provided by your preferred web browser. For your ease of reference, we have provided the links below which provide instructions on how to remove and delete cookies for some of the more common web browsers. Please be aware that if you block cookies from the websites, some or all the website's functions may not perform as intended:

[Firefox](#)

[Internet Explorer](#)

[Google Chrome](#)

[Safari](#)

Mobile phone users may have to refer to their handset manual for details on how to block cookies using their mobile browser. For more information about online behavioural advertising cookies and opt-out controls, please go to <http://www.youronlinechoices.eu/>

## **15 Contact us**

Should you wish to make any comments or requests in relation to anything in this Policy, please contact as follows:

- By email at: [privacy@quidglobal.com](mailto:privacy@quidglobal.com) or
- Write to the Privacy Officer at: quid NZ Limited, Level 1 Findex House, 57 Willis Street, Wellington Central, Wellington, 6011, New Zealand